

Colorado Department of Health
Hazardous Materials & Waste Management Division

Comments

on

DRAFT FINAL

TECHNICAL MEMORANDUM (No. 2)

MODIFICATIONS TO FIELD ACTIVITIES

(Addendum to Final Phase I RFI/RI Work Plan)

for

SOLAR EVAPORATION PONDS

OU-4

ROCKY FLATS PLANT

MARCH, 1993

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Specific Comments:

Section 3.4: The discussion of "10 discrete samples to be located in areas of anomalous radioactivity" must be revised to reflect the revised approach as discussed in the status meeting of March 25, 1993. DOE's letter of April 29, 1993 (F. Lockhart to M. Hestmark and G. Baughman) provided a rationale and map locations for the ten sites. Once approved or modified, the final rationale and final map should be incorporated as a section into TM-2.

Section 3.5.2: The Division acknowledges that the hole numbers from eight of twelve boreholes originally located in the ponds have been reassigned to interim boreholes. To prevent any misunderstanding on the part of DOE or the Division, the following revisions must be made to the TM-2 document:

- o A total of twelve, not "up to twelve", boreholes have in fact been postponed pending the removal of sludge from Ponds 207C and the three 207B-Series ponds. Please modify the statement accordingly.
- o All twelve postponed boreholes, three per pond, must be shown as tentative locations. These should be clearly differentiated on Figure 3-1 or possibly a new map. DOE may decide if the four previously numbered holes maintain the same number, assume new numbers or become numberless.

Section 3.5.3: This section discusses the three boreholes that have been eliminated as deep bedrock borings. It would be helpful to state in the last paragraph of the section, page 3-11, that hole 44193 is the other deep borehole to be drilled and to provide the rationale for retaining the hole.

Section 3.5.5: Borehole 44493; Wells 3787 and 3887 in the vicinity of Pond 207B South were referenced to Figure A-1, please add these wells to the figure.

Section 3.6: Piezometer Bank PZ04; The discussion of the piezometer banks, although technically correct, is confusing. When trying to coordinate the discussion with Figure 3-1, one naturally groups the two northerly and the three southerly piezometers. This undermines the discussion; some slight alteration of the text would be appropriate and adequate.

Section 3.7: The Division acknowledges the specification of Cyanide and Sulfide as the two remaining inorganics of interest. It is the Division's understanding that other inorganics of interest are accounted for in the other analytical suites (i.e. Nitrates, etc).

Section 4.0: Although the Division appreciates the insights into the expected schedule slippage it is inappropriate to a "technical" memorandum. Consequently, Section 4.0 and Figure 4-1 must be removed from document. General references to delays in water and sludge removal and, therefore, the need to modify the work plan are appropriate and may remain in the document.